

Exhibit A-4

J.G. v. United Inn (1:20-cv-05233-SEG)**Plaintiff J.G.'s Fees Exhibit – Finch McCranie, LLP**

The enclosed fee exhibit chart summarizes the work that Plaintiff J.G.'s legal team at Finch McCranie (including partners, associates, and paralegals) performed in Plaintiff's case. For ease of review, the chart is broken into the following categories:

- Filed pleadings, depositions, discovery requests, and discovery responses
- Trial preparation, trial, and focus groups
- Email correspondence
- Settlement correspondence
- Open records correspondence
- Filed pleadings in declaratory judgment action
- Appeal in declaratory judgment action

<u>FILED PLEADINGS, DEPOSITIONS, DISCOVERY REQUESTS, AND DISCOVERY RESPONSES</u>					
Date	Doc. No. (if any)	Event (with parenthetical description of work performed)	Partner Time	Associate Time	Paralegal Time
12/28/20	1	J.G.'s Complaint (participate in several multi-hour meetings with Plaintiff to interview Plaintiff and gather facts prior to drafting complaint; conduct extensive legal research to prepare legal allegations under TVPRA, including surveying TVPRA caselaw from across country interpreting elements of 1595(a) beneficiary claim; conduct extensive factual research to draft factual	50.0		0.2

<u>FILED PLEADINGS, DEPOSITIONS, DISCOVERY REQUESTS, AND DISCOVERY RESPONSES</u>					
Date	Doc. No. (if any)	Event (with parenthetical description of work performed)	Partner Time	Associate Time	Paralegal Time
12/28/20	1	J.G.'s Complaint (participate in several multi-hour meetings with Plaintiff to interview Plaintiff and gather facts prior to drafting complaint; conduct extensive legal research to prepare legal allegations under TVPRA, including surveying TVPRA caselaw from across country interpreting elements of 1595(a) beneficiary claim; conduct extensive factual research to draft factual	50.0		0.2

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		allegations in complaint pertaining to United Inn, including review and analysis of police reports, online reviews, sex buyer databases, and witness interviews; hire and interface with private investigator to investigate publicly-available information about United Inn; draft the 49-page complaint)			
12/29/20	4	J.G.'s Certificate of Interested Persons (draft certificate)	.2		0.1
12/29/20	5	J.G.'s Mtn for Protective Order w/ proposed Order (draft motion for protective order and proposed order; research and analyze caselaw relating to same motion)	1.0		0.1
1/4/21	7	Mtn to Reassign Case w/ proposed Order (draft motion to reassign case and proposed order; research and analyze caselaw relating to same motion)	.8		0.1
1/15/21	8	Return of Service Executed by J.G. + Affidavit of Service (review and analyze return of service and affidavit of service)	.1		0.1
2/12/21	15	Dft's First Mtn to Dismiss with 1 Exhibit (review and analyze motion to dismiss and exhibit)	.7		0.0
2/22/21	17	Order denying Mtn to Reassign Case (review and analyze order)	.2		0.0
2/22/21	18	Resp in Opp re First Mtn to Dismiss with 1 Exhibit (review and analyze motion to dismiss and caselaw cited in support; research and analyze caselaw	35.0		0.2

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		supporting Plaintiff's position; draft response in opposition to motion to dismiss; confer with co-counsel re the same)			
3/1/21	19	Joint Preliminary Report and Discovery Plan (draft initial plan; confer with opposing counsel re the same via telephone; revise and finalize report; file the same)	1.0		0.1
3/8/21	21	Reply to Resp to Mtn re First MTD (review and analyze reply brief and caselaw cited in support)	.5		0.0
3/11/21	23	Standing Order re Civil Litigation for Judge Michael Brown (review and analyze order and communicate with team and staff regarding same)	.3		0.0
3/11/21	24	Scheduling Order re Joint Preliminary Report and Discovery Plan (review and analyze order and calendar deadlines)	.3		0.0
3/15/21	25	J.G.'s Initial Disclosures and Certificate of Service (COS) for Initial Disclosures (draft and finalize disclosure providing information required under Rule 26(a)(1); review file for required information on witnesses)	.7		0.2
3/15/21	26	Dft's Initial Disclosures and COS for Initial Disclosures (review initial disclosures; annotate witness list; prepare files on potential witnesses)	.4		0.0
6/7/21	28	Mtn for Leave of Absence for R. Hendrix	0.0		0.1
6/21/21		Dft's Initial Disclosures Production	1.0		0.0

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		(review and analyze 442 pages of insurance documents responsive to item 10 in NDGA initial disclosures form)			
7/30/21	30	Order granting Mtn for Protective Order (review and analyze order; talk with team and J.G. re the same)	.2		0.0
7/30/21	31	Order staying action pending 11th Circuit's decision in <i>Doe #1 v. Red Roof Inns</i> (review and analyze order; talk with team and client re the same)	.2		0.0
8/2/21	32	J.G.'s Disclosure of Identity	0		0.1
12/29/21	35	Notice by J.G. re 31 Order (review and analyze 11 th Circuit's decision in <i>Doe #1 v. Red Roof Inns</i> and confer with opposing counsel re proposed briefing schedule)	.8		0.1
12/30/21	36	Order Reopening Case (review and analyze order and calendar new deadlines)	.1		0.0
1/12/22	37	Dft's Second MTD with 2 Exhibits (review and analyze motion dismiss; annotate the same and outline issues for response; communicate with Plaintiff re MTD)	1.0		0.0
1/26/22	39	J.G.'s Resp in Opp to Dft's Second MTD (review and analyze <i>Doe #1 v. Red Roof Inns</i> and survey TVPRA caselaw nationwide; confer with co-counsel on arguments and various strategic considerations; draft, finalize, and file response brief)	20.0		0.2
2/2/22	40	Request for Leave of Absence for R. Hendrix	0.0		0.1

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2/9/22	41	Reply Brief re Second MTD (review, analyze, and annotate brief)	.5		0.0
5/4/22	43	Standing Order re Civil Litigation (Geraghty) (review and analyze order and communicate with team and staff regarding same)	.3		0.2
7/7/22		J.G.'s subpoena for deposition testimony to DeKalb County PD Officer C.D. King (communicate with team regarding review of police reports from open records request to DeKalb County PD; review subset of reports and identify Officer King as officer with knowledge of United Inn)	.3		0.1
7/7/22		J.G.'s subpoena for deposition testimony to DeKalb County PD Officer J.S. Woody (communicate with team regarding review of police reports from open records request to DeKalb County PD; review subset of reports and identify Officer Woody as officer with knowledge of United Inn)	.3		0.1
7/7/22		J.G.'s subpoena for deposition testimony to DeKalb County PD Officer M.A. Connors (communicate with team regarding review of police reports from open records request to DeKalb County PD; review subset of reports and identify Officer Connors as officer with knowledge of United Inn)	.3		0.1
7/7/22		J.G.'s subpoena for deposition testimony to DeKalb County PD Officer M.L. Hill (communicate with team regarding review of police reports from open records request to DeKalb County	.3		0.1

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		PD; review subset of reports and identify Officer Hill as officer with knowledge of United Inn)			
8/2/22	44	Order denying Dft's second MTD (review and analyze order; annotate the same; prepare file on discovery strategy and summary judgment strategy based on contents of order)	.8		0.0
8/15/22	45	Answer to Complaint (review and analyze Answer; update files on discovery strategy and summary judgment strategy based on contents of Answer)	.5		0.0
9/11/22		Prepare for deposition of DeKalb County PD Officer C.D. King (review and analyze complete index prepared by paralegal of DeKalb County Police Department reports; review and analyze relevant reports, including but not limited to reports involving Officer King; review and analyze documents produced by various DeKalb County agencies in response to Open Records Act requests that were relevant to Officer King's deposition; draft deposition outline; schedule and coordinate court reporter and videographer)	6.5		0
9/12/22		Deposition of C.D. King depo (10:43am-1:00pm; 2 hrs 17 min.) (take the deposition; review outline and documents in preparation for taking deposition)	3.5		0.2
9/15/22	46	Dft's 1st ROGs (qty: 22) and 1st RPDs (qty: 26) to J.G.	1.0		0.0

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		(review Dft's first discovery requests; confer with J.G. regarding the same; develop strategy to respond to the same)			
9/22/22	47	J.G.'s 1st RFAs (qty: 133), ROGs (qty: 18), RPDs (qty: 65) to Dft (draft initial discovery requests after conferring with J.G., reviewing caselaw defining elements of 1595(a) beneficiary claim, reviewing client interview notes, reviewing key records identified in response to Open Records Act requests, and reviewing findings from private investigator's search of public records)	15		0.6
11/2/22	48	J.G.'s Resp to Dft's 1st ROGs (qty: 22) and 1st RPDs (qty: 26) (production of 33,131 pages) (review and analyze Dft's requests; confer with J.G. regarding the same; draft responses and confer with J.G. regarding the same to verify accuracy and completeness; communicate with staff regarding production of responsive document; participate in review of responsive documents to be produced and review notes of documents reviewed to confirm production of responsive documents is complete)	35		1.4
11/11/22	49	Dft's Resp to J.G.'s 1st ROGs (qty: 18), RFAs (qty: 133), RPDs (qty: 65) (623 production pages) (review and analyze responses; annotate the same; confer with Plaintiff regarding responses; update files on discovery strategy and summary judgment strategy based on contents of discovery responses; review and analyze production multiple times for purposes of	25		0.0

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		deposition strategy and questioning, further discovery requests, subpoena requests, and Open Records Act requests; oversee preparation of chronological analysis of trespass reports produced by Dft and confer with team regarding the significance of the same)			
12/16/22	50, 50-1	Joint Mtn for Ext of Time to Complete Discovery and proposed Order (8 pages) (draft joint motion and proposed order; communicate with opposing counsel regarding the same)	1.0		0.1
12/16/22	51	Amended Scheduling Order (review amended order and calendar new deadlines)	.1		0.0
1/9/23	52	J.G.'s 2nd Prod of Docs (production of 3,791 pages) (review and analyze Dft's initial discovery requests and prepare supplemental production of responsive documents; participate in review of documents to be produced as part of supplemental production and review notes of documents reviewed by team to confirm supplemental production of responsive documents is complete)	7.0		0.5
1/9/23	53	J.G.'s Notices of Deposition to (1) United Inn's 30(b)(6) representative; (2) Tahir Shareef; and (3) Ashar Islam (review draft notices; communicate with opposing counsel regarding same)	.2		0.2
1/11/23		Dft's production of excess insurance policies (170 pages)	1.5		0.0

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		(review and analyze the same; prepare chart on insurance coverage information; confer with insurance coverage counsel regarding the same)			
1/18/23		Dft's Notice of J.G.'s Deposition (review the deposition notice; confer with J.G. regarding the same; schedule deposition preparation meetings)	0.3		0.0
2/3/23		Deposition preparation with J.G. (meet with J.G. to answer case questions, discuss case status, provide an overview of depositions as part of discovery process, and to begin preparing her for deposition on 2/8/23)	2.0		0
2/6/23		Deposition preparation with J.G. (meet with J.G. to review various documents produced in discovery and to prepare her for deposition on 2/8/23)	3.0		0
2/7/23	54	J.G.'s 3rd Prod of Docs (7 pages) (review and analyze Dft's initial discovery requests and prepare supplemental production of responsive documents)	.1		0.2
2/7/23		Deposition preparation with J.G. (meet with J.G. to review various documents produced in discovery and to prepare her for deposition on 2/8/23)	2.0		0
2/8/23		J.G.'s Deposition (10:05am-2:30pm; 4 hrs 25 min.) (attend J.G.'s deposition and represent her in deposition; meet with J.G. in advance of deposition to answer questions and prepare her)	5.5		0.0

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2/10/23	55	J.G.'s Amended Notices of Deposition to (1) Dft's 30(b)(6) representative; (2) Tahir Shareef; and (3) Ashar Islam (review draft notices; communicate with opposing counsel regarding same)	.2		0.2
2/15/23	56	Dft's 2nd ROGs (qty: 2) and 2nd RPDs (qty: 2) to J.G. (review and analyze Dft's second discovery requests; confer with J.G. regarding same)	.2		0.0
2/20/23		Preparation for Depositions of Tahir Shareef, Ashar Islam, and Dft's 30(b)(6) representative (review and analyze key documents in document productions by J.G. and Dft and summary notes regarding the same; review and analyze key documents from third parties (e.g., Open Records Act responses); review and analyze discovery strategy and summary judgment strategy files; review and analyze caselaw on 1595(a) elements; prepare deposition outlines)	5.5		0
2/21/23		Preparation for Depositions of Tahir Shareef, Ashar Islam, and Dft's 30(b)(6) representative (review and analyze key documents in document productions and notes regarding the same; review and analyze key documents from third parties (e.g., Open Records Act responses); review and analyze discovery strategy and summary judgment strategy files; review and analyze caselaw on 1595(a) elements; prepare deposition outline)	7.5		0

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2/22/23		Deposition of Tahir Shareef and Dft's 30(b)(6) Rep. (9:20am-3:45p; 6 hrs 25 min.) (take deposition; prepare for the same by reviewing outlines and exhibits)	8.0		0.0
2/22/23		Deposition of Ashar Islam depo (4:09p-6:37p; 2 hrs 28 min.) (take deposition; prepare for the same by reviewing outlines and exhibits)	3.0		0.0
2/24/23	57	J.G.'s 1st Supp ROGS (qty: 2) and 1st Supp RPDs (qty: 20) to Dft (draft supplemental interrogatories and requests for production based on depositions on 2/22/23)	1.5		0.4
3/16/23	58	J.G.'s Resp to Dft's 2nd ROGs (qty: 2) and 2nd RPDs (qty: 2) (confer with client regarding requests; draft and serve responses to the same)	.4		0.4
3/27/23	59	Dft's Resp to J.G.'s 1st Supp ROGs (qty: 2) and 1st Supp RPDs (qty: 20) (review, analyze, and annotate responses; update files on discovery strategy and summary judgment strategy based on supplemental production)	.4		0.0
3/31/23	60	Unopp Mtn for Proposed 2nd Modified Scheduling Order with proposed Order (8 pages) (draft motion outlining discovery history and explaining basis for request; confer with opposing counsel regarding the same)	1.0		0.1
4/3/23	61	2nd Modified Scheduling Order (review the same and calendar updated deadlines)	.1		0.0

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4/18/23		Dft's 1st Supp Prod (86 pages) (review and analyze production; update files on discovery strategy and summary judgment strategy based on supplemental production)	.5		0.0
4/20/23		Dft's Prod (1,202 pages) (review and analyze production; update files on discovery strategy and summary judgment strategy based on supplemental production)	3.0		0.0
4/27/23		Dft's Prod & Re-Prod (14 pages) (review and analyze production; update files on discovery strategy and summary judgment strategy based on supplemental production)	.1		0.0
4/28/23	62	J.G.'s Notices of Deposition to (1) United Inn's 30(b)(6) representative; (2) Tahir Shareef; and (3) Ashar Islam (review draft notices; confer with opposing counsel regarding the same)	.1		0.2
5/2/23		Deposition of Ashar Islam (5:09p-5:57p; 48 min) (take deposition; prepare for the same by reviewing supplemental productions and preparing outline)	1.5		0.0
5/2/23		Deposition of Tahir Shareef and Dft's 30(b)(6) Representative (1:14p-4:58p; 3 hrs 44 min) (take deposition; prepare for the same by reviewing supplemental productions and preparing outline)	8		0.0
5/12/23	63	J.G.'s 1st Supp RFAs to Dft (qty: 25); 2nd Supp ROGS to Dft (qty: 8), and 2nd Supp RPDs to Dft (qty: 6)	2.5		0.3

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		(review notes from depositions and supplemental productions and prepare topics for supplemental discovery requests; draft and serve the same requests)			
5/12/23	64	J.G.'s Notice of Intent to Serve Subpoenas to HomeTrust Bank and Investigator T. Wade with 1 Exhibit	0.0		0.1
5/12/23	65	J.G.'s subpoena to HomeTrust Bank (analyze Dft's supplemental production and draft subpoena requests based on same; confer with counsel for HomeTrust Bank regarding subpoena)	.5		0.2
5/15/23		J.G.'s subpoena to Investigator T. Wade (analyze Dft's supplemental production and draft subpoena requests based on same)	.2		0.1
5/16/23	67, 68	Notice of Service of Rule 45 Subpoena on HomeTrust Bank and affidavit of service	0.0		0.3
5/22/23	70	Amended Notice for Leave of Absence for D. Bouchard	0.1		0.1
5/22/23		Notice of Hearing: Telephone Conf for 5/26/23 (review same notice and confer with co-counsel regarding the same)	.1		0.0
5/25/23	71	Dft's Supp Prod (~2 hours of bodycam video from DeKalb PD) (review video and draft notes regarding same for trial folder)	1.5		0.0
5/26/23	72	Telephone Conference re discovery dispute (prepare for telephone conference and participate in conference)	0.0		0.0

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5/31/23	73	J.G.'s subpoenas to Bulldog Insurance, Midland Loan Services, Kitchens Kelley Gaynes, Morgan & Chakales, Alischild Tax & Acct (analyze Dft's supplemental production and draft subpoena requests based on same)	.7		0.5
5/31/23	74	J.G.'s Supp Initial Disclosures; 3rd Supp RPDs to Dft (qty. 14) (review discovery notes and prepare topics for supplemental discovery requests; draft and serve the same requests)	1.5		0.4
6/12/23	75, 76	J.G.'s Affidavit of Service for Subpoenas to Bulldog Insurance and Alischild Tax & Acct	0.0		0.2
6/16/23	77	J.G.'s Expert Reports for Darrell Chaneyfield and Naeshia McDowell (56 pages) (review and analyze draft reports and citations therein to third-party sources and discovery record; confer with experts regarding the same)	5		0.1
6/16/23		Dft's Expert Report for Karim Vellani (86 pages) (review and analyze report and citations therein to third-party sources and discovery record; prepare notes on deposition strategy, <i>Daubert</i> strategy, and trial strategy)	10		0.0
6/22/23		Dft's Supp Initial Disclosures (review and analyze supplemental disclosures identifying new hotel staff; prepare chart comparing Dft's staff lists produced during discovery for summary judgment file and trial file)	.5		0.0

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6/26/23	78	Dft's Resp to J.G.'s 1st Supp RFAs (qty: 25), 2nd Supp ROGs (qty: 8), and 2nd Supp RPDs (qty: 6) (12 production pages) (review and analyze supplemental responses and production; draft notes regarding the same for summary judgment file and trial file)	.7		0.0
6/30/23	79	Dft's Resp to J.G.'s 3rd Supp RPDs (qty: 14) (16 production pages) (review and analyze supplemental responses and production; draft notes regarding the same for summary judgment file and trial file)	.3		0.0
7/18/23	80	Joint Mtn for Order Entry of 3rd Modified Scheduling Order with proposed Order (review draft motion and proposed order prepared by opposing counsel; confer with opposing counsel re the same)	.2		0.0
7/19/23	81	Modified Scheduling Order (review modified schedule, and calendar new dates)	.1		0.0
7/27/23	82	J.G.'s 4th Prod of Docs (3,322 pages) (produce documents provided in response to subpoenas to Bulldog Insurance, HomeTrust Bank, and Morgan & Chakales; review the same documents prior to production and draft notes on the same for summary judgment and trial)	2.5		0.6
9/6/23		Dft's Supp Prod (7 images) (review supplemental production)	.1		0.0
9/27/23	83	Joint Mtn for Order (Entry of 4th Modified Scheduling Order) w/ proposed Order	.5		0.1

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		(draft joint motion and confer with opposing counsel regarding the same)			
10/4/23	84	Modified Scheduling Order (review modified schedule and calendar new deadlines)	.1		0.0
10/11/23	85	Dft's Notice of Intention to Seek Apportionment of Fault Against Non-Parties (review and analyze Dft's notice; research caselaw relating to apportionment under 1595(a); confer with co-counsel regarding the same)	1.0		0.0
10/12/23	86	Mtn for Sanctions Against Dft with 28 Exhibits	0.0		0.0
10/13/23	87	J.G.'s NOD for Dft's Expert Karim Vellani (review and approve notice; confer with opposing counsel re the same)	0.1		0.1
10/20/23		Dft's Supp Prod (1 video) (review video)	.1		0.0
10/20/23		Meet with witness N.S. (contact N.S. and schedule meeting; travel to meet N.S.; meet with N.S.; prepare and execute affidavit following meeting)	4.5		0.0
10/23/23		Notice of Hearing: Telephone Conf on 11/1/23 (review notice)	.1		0.0
10/25/23		Dft's NOD of J.G.'s Expert Naeshia McDowell (review notice, and confer with N. McDowell regarding the same)	0.2		0.0
10/26/23	88	Dft's Resp in Opp re Mtn for Sanctions with 9 Exhibits	0.0		0.0

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		(review brief and draft notes regarding the same relating to reply brief)			
11/3/23	89	J.G.'s Amended NOD for Dft's Expert Karim Vellani (review and approve notice; confer with opposing counsel regarding the same)	0.1		0.1
11/9/23	91	Reply Brief re Mtn for Sanctions with 1 Exhibit (draft brief; review opening brief and response brief)	0.0		0.2
11/9/23		Preparation for Deposition of Naeshia McDowell (meet with N. McDowell and provide overview of depositions as part of discovery process; review report; prepare for deposition)	3.5		0.0
11/10/23		Deposition of Naeshia McDowell (10:02a-2:30p; 4 hrs 28 min.) (meet with N. McDowell to prepare for deposition; attend deposition and defend N. McDowell during deposition)	5.5		0.0
11/13/23	92	Joint Mtn for Proposed Fifth Modified Scheduling Order w/ proposed Order (draft motion; confer with opposing counsel regarding the same)	.5		0.1
11/13/23		Dft's NOD of J.G.'s Expert Darrell Chaneyfield (review notice, and confer with D. Chaneyfield regarding the same)	0.2		0.0
11/15/23		Preparation for Deposition of Darrell Chaneyfield (meet with D. Chaneyfield and provide overview of depositions as part of discovery process; review report and prepare for deposition)	4.5		0.0

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11/16/23	94	Fifth Modified Scheduling Order (review modified schedule and calendar new deadlines)	.1		0.0
11/16/23		Deposition of Darrell Chaneyfield depo (10:06a-5:24p; 7 hrs 18 min.) (meet with D. Chaneyfield to prepare for deposition; attend deposition and defend D. Chaneyfield during deposition)	8.0		0.0
11/17/23	95	J.G.'s 5th Prod of Docs (2 videos, 3 images) (review materials to be produced as part of supplemental production; produce the same)	.2		0.2
11/17/23	96	J.G.'s 2nd Amended NOD of Dft's Expert Karim Vellani (review and approve notice; confer with opposing counsel regarding the same)	.1		0.1
11/17/23		Dft's Supp Prod (4 pages) (review supplemental production and draft notes regarding the same for summary judgment and trial files)	.1		0.0
11/26/23		Preparation for Deposition of Dft's Expert K. Vellani (review and analyze K. Vellani's 86-page expert report; confer with J.G.'s expert D. Chaneyfield regarding Vellani's expert report; draft deposition outline; prepare exhibits for deposition)	6.0		0.0
11/27/23		Preparation for Deposition of Dft's Expert K. Vellani	7.5		0.0

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		(review and analyze K. Vellani's 86-page expert report; confer with J.G.'s expert D. Chaneyfield regarding Vellani's expert report; draft deposition outline; prepare exhibits for deposition)			
11/28/23		Deposition of Dft's Expert K. Vellani (9:32a-4:07p; 6 hrs 35 min.) (take deposition; prepare for same by reviewing outline and exhibits)	8.0		0.0
12/4/23		Deposition of J.G.'s expert D. Chaneyfield (11:08a-2:10p; 3 hrs 2 min.) (attend deposition and defend D. Chaneyfield)	3.1		0.0
12/12/23	97	Minute Entry for Show Cause Hearing on 12/12/23 (attend hearing; prepare for the same hearing by reviewing sanctions briefing)	0.0		0.0
12/15/23	98	Notice of Filing Amended Exhibit 28 re Mtn for Sanctions with 1 Exhibit (prepare notice and update exhibit)	0.0		0.1
12/21/23	99, 99-1	Dft's Mtn to Exclude Testimony of J.G.'s Expert McDowell with Brief in Support (review and analyze the same; draft notes regarding responding to the same; confer with co-counsel and N. McDowell re the same)	.5		0.0
12/21/23	100, 100-1	Dft's Mtn to Exclude Testimony of J.G.'s Expert Chaneyfield w/ Brief in Support with 3 Exhibits (review and analyze motion to exclude; draft notes regarding responding to the same; confer with co-counsel and D. Chaneyfield re the same)	.8		0.0

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12/21/23	102, 102-1, 103, 104, 104-4	Dft's MSJ with Brief ISO (3 Exhibits), and Statement of Material Facts (review and analyze motion for summary judgment; draft notes regarding points in response to the same; research caselaw cited in Dft's MSJ)	2.0		0.0
12/21/23	109	JG's Mtn to Exclude Testimony of Dft's Expert Vellani with Supporting Brief (15-page brief with 2 Exhibits) (review and analyze K. Vellani's 86-page expert report and transcript from 6.5-hour deposition; research and outline CA11 caselaw on <i>Daubert</i> ; draft and file 15-page motion to exclude Vellani's testimony)	25.0		0.2
1/3/24	111	Joint Mtn for Extension of Deadline to File Resp to MSJ, Mtn to Exclude McDowell, Chaneyfield, Vellani and proposed Order (draft and file the same; confer with opposing counsel regarding the same)	.2		0.1
1/18/24	114	JG's Resp to Statement of Material Facts re MSJ (13 pages) (review and analyze Dft's statement of material facts; review and analyze discovery record for citations showing that Dft's statement of material facts is misleading, incomplete, or inaccurate; draft and finalize J.G.'s response to Dft's statement of material facts)	8.0		0.2

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1/18/24	115, 115-1 through 115-24	JG's Resp in Opp to Dft's MSJ (26 pages) with 22 Exhibits, including Plaintiff's Statement of Material Facts (25 pages) (draft response in opposition to Dft's MSJ; research caselaw, jury instructions on elements of claims, and discovery record; confer with co-counsel regarding draft response; draft statement of material facts; review and analyze deposition testimony and document productions to prepare the statement of material facts).	40.0		1.5
1/18/24	116	J.G.'s Notice of Filing Deposition Transcripts ISO Resp in Opp to MSJ with 9 Exhibits	0		0.6
1/19/24	117	Dft's Resp in Opp re Mtn to Exclude Vellani (review and analyze response; draft notes on points to raise in reply brief)	.5		0.0
1/19/24	118, 118-1 through 118-6	J.G.'s Resp in Opp re Mtn to Exclude Chaneyfield (25 pages with 6 Exhibits) (review and analyze deposition transcript from D. Chaneyfield's 10.5-hour deposition and his expert report; research caselaw cited in Dft's motion to exclude; draft response brief)	30		0.4
1/19/24	119, 119-1 through 119-4	J.G.'s Resp in Opp re Mtn to Exclude McDowell (9 pages with 4 Exhibits) (review and analyze deposition transcript from N. McDowell's 4.5-hour deposition and her expert report; research caselaw cited in Dft's motion to exclude; draft response brief)	10		0.4

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1/22/24	120	J.G.'s Notice of Filing Overlong Brief in Resp to Dft's MSJ (draft and file notice)	.2		0.1
1/30/24	121	Joint Mtn for Extension of Deadline for Parties to File Reply Briefs w/ proposed Order (draft and file the same; confer with opposing counsel regarding the same)	.2		0.0
1/31/24	122	Notice of Appearance by Gabe Knisely (JG)	0.0		0.1
2/16/24	124	Dft's Reply Brief re Mtn to Exclude Chaneyfield (review and analyze reply brief; confer with D. Chaneyfield re the same)	.5		0.0
2/16/24	125	Dft's Reply Brief re Mtn to Exclude McDowell (review and analyze reply brief; confer with N. McDowell re the same)	.3		0.0
2/16/24	126	Dft's Sealed Reply to Resp to MSJ (review and analyze reply brief; confer with co-counsel re the same)	1.0		0.0
2/16/24	127	Dft's Resp to Statement of Material Facts (review and analyze response to statement of material facts)	.4		0.0
2/16/24	129	J.G.'s Reply Brief re Mtn to Exclude Vellani (6.5 pages) (review and analyze Dft's response brief and caselaw cited therein; draft 6.5-page reply brief and file the same)	6.0		0.1
7/5/24	131, 131-1 through	Dft's Notice of Supp Authority in support of MSJ with 3 Exhibits	1.0		0.0

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	131-3	(review and analyze Dft's brief and the caselaw cited therein; draft notes regarding the same on response point)			
7/8/24	132, 132-1	Notice of J.G.'s Resp to Dft's Notice of Supp Authority (8 pages with 1 Exhibit) (review and analyze caselaw relevant to Dft's Notice of Supp. Authority and draft response notice based on the same caselaw; confer with co-counsel re the same)	8.0		0.1
7/11/24	133	Oral Argument on Dft's MSJ (review and analyze 50+ pages of MSJ pleadings, including legal briefs and statements of material facts filed nearly 6 months prior; review and analyze key cases cited in MSJ pleadings; prepare oral argument outline; prepare illustrative PowerPoint for oral argument; participate in oral argument)	15.0		0.0
8/16/24	138	Order Granting in part and denying in part Dft's MSJ and Granting in part J.G.'s Mtn for Sanctions (review and analyze 55-page order multiple times; prepare notes on trial strategy, witness examinations, motion- <i>in-limine</i> briefing, trial briefing, jury charge conference, and more based on Court's reasoning)	2.0		0.0
9/10/24	140	Notice of Appearance by Oto Ekpo (draft and file notice of appearance)	0.1		0.1
9/10/24 – 10/10/24		Oto Ekpo's review and analysis of case file (Review complaint, motions to dismiss and orders, motion for summary judgment and order, depositions,	30		0.0

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		and discovery materials to become familiar with case file)			
9/16/24	141	Proposed Pretrial Order by J.G. (prepare initial draft PTO and confer with opposing counsel re the same)	10.0		0.2
9/25/24	142	Request for Leave of Absence by D. Bouchard (draft and file the same request)	0.1		0.1
10/31/24	145	Order: Jury trial for 4/14/25 (2.5-page order) (review order; communicate with team regarding same and calendar dates; communicate with Plaintiff, co-counsel, and experts regarding the key dates)	.4		0.0
11/15/24	146	Order scheduling Mediation for 12/17/24 (review order scheduling mediation)	.1		0.0
11/27/24		Preparation and service of trial subpoena for FBI Agent Strickler (draft and serve Touhy correspondence to initiate process for subpoenaing a federal agent; engage in series of back-and-forth communications with FBI counsel regarding subpoena to FBI Agent Strickler)	1.5		0.1
12/9/24	147	Mtn to Intervene by Northfield (8 pages with 2 Exhibits) (review and analyze motion to intervene; review caselaw cited therein; communicate with co-counsel regarding the same)	.7		0.0
12/10/24		Mediation statement (3-page single-spaced) submitted to Magistrate Bly for mediation ordered by Court (Doc. 146)	4.0		0.0

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		(review Doc. 146 and Magistrate Bly's directions for mediation statement; draft and submit statement)			
12/17/24	149	Mediation Conference on 12/17/24 with Magistrate Bly (participate in the mediation conference; travel to and from the federal courthouse; communicate with Plaintiff regarding the mediation conference; communicate with opposing counsel regarding the same)	4.0		0.0
12/18/24	150, 150-1	J.G.'s Consent Mtn for Extension of Time to File Resp to Northfield's Mtn to Intervene and proposed Order (draft 3-page motion and proposed order; communicate with opposing counsel regarding the same)	.4		0.1
1/6/25	152	J.G. Resp in Opp re Mtn to Intervene (11 pages) (research and analyze caselaw cited in Northfield's motion to intervene; communicate with co-counsel regarding the same; draft and file response)	9.0		0.1
2/3/25	156	Northfield's Reply to Resp to Mtn to Intervene (review and analyze the same)	.4		0.0
2/14/25	157	Notice of Leave of Absence by O. Ekpo (prepare and file notice)	0.1		0.1
2/20/25	158	Joint Mtn to File Excess Pages re MIL and proposed Order (review and approve joint motion; confer with opposing counsel regarding the same)	.1		0.1

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2/26/25	160, 160-1 through 160-22	Dft's Consolidated MIL (25 pages with 22 Exhibits) (review and analyze consolidated MIL and exhibits; draft notes on issues to raise in response brief; draft notes on trial strategy and witness examinations)	1.0		0.0
2/26/25	161, 161-1 through 161-7	J.G.'s Consolidated MIL (30 pages with 7 Exhibits) (review notes on discovery, trial strategy, and court orders to identify topics for motions <i>in limine</i> ; research caselaw relating to issues raised in motions <i>in limine</i> ; review MILs filed in other TVPRA cases; draft brief; confer with co-counsel regarding the same)	25.0		0.6
3/10/25	162	Joint Mtn to Extend the Deadline to File Responses in Opp to MILs and proposed Order (draft and file joint motion and proposed order; confer with opposing counsel regarding the same)	.2		0.1
3/14/25	164	Joint Mtn for Ext of Page Limit and proposed Order (draft and file joint motion and proposed order; confer with opposing counsel regarding the same)	.2		0.1
3/14/25	165, 165-1 through 165-6	Dft's Response in opposition to J.G.'s MILs (24 pages with 6 Exhibits) (review and analyze Dft's response brief and note issues to raise in response; draft notes for trial strategy and witness examinations)	.8		0.0
3/14/25	166, 166-1	Dft's Mtn for Leave to File Rule 412 Mtn Under Seal and proposed order	.2		0.0

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		(review Dft's motion and text of Rule 412)			
3/14/25	167, 167-1	J.G.'s Resp in Opp to Dft's MIL (30 pages with 1 Exhibit) (review Dft's MILs and identify points to raise in response; research caselaw relating to the same and opinions interpreting the elements of a 1595(a) claim; draft response brief; confer with co-counsel regarding the same)	25		0.2
3/18/25	168, 168-1	Joint Mtn for Extension of Deadline to File Replies in support of MILs and proposed Order (draft joint motion and confer with co-counsel regarding the same)	.1		0.1
3/25/25	170, 170-1	Joint Mtn for Extension of Deadline to File proposed Requests to Charge and proposed order (review and approve joint motion; confer with Dft's counsel regarding the same)	.2		0.1
3/25/25	171	Order Granting Joint Mtn for Ext to File proposed Requests to Charge (review order and calendar deadlines)	.1		0.0
3/25/25		Amended Notice of Trial – continued to 7/7/25 (review order and calendar deadlines; communicate with Plaintiff and co-counsel regarding new schedule)	.1		0.0
3/26/25	172, 172-1	Dft's Reply in Support of MILs (14 pages with and 1 Exhibit) (review and analyze reply; draft notes for trial strategy and witness examinations)	.5		0.0
3/26/25	173	J.G.'s Reply to Resp re MIL (15 pages)	10.0		0.1

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		(review Dft's response to J.G.'s MIL and prepare response brief; research caselaw relating to the same; confer with co-counsel relating to the same)			
4/2/25		Subpoena Investigator Benton (prepare and serve subpoena; meet with witness prior to trial about sex trafficking in DeKalb County and United Inn)	3.0		0.1
5/5/25	176	J.G.'s Mtn to File Out-of-Time Resp in Opp to Dft's Rule 412 Mtn and Resp in Opp. (2 pages) (draft and file brief; confer with Dft's counsel regarding the same)	.8		0.1
5/6/25	177	Dft's Resp in Opp re Mtn to File Out-of-Time Resp in Opp to Dft's Rule 412 Mtn (3 pages) (review and analyze)	.2		0.0
5/7/25	178	J.G.'s Reply Brief re Mtn to File Out-of-Time Resp in Opp to Dft's Rule 412 Mtn (3 pages) (draft and file brief)	1.5		0.1
12/28/20 – 6/10/25		Conversations with firm partners R. Hendrix and C. Lietz (i.e., ~10 hours/year)¹ (strategic conversations during pendency of litigation regarding discovery strategy, investigative strategy, briefing strategy, and trial strategy)	50.0		0.0

¹ This total is underinclusive. David Bouchard and Oto Ekpo regularly talked with their partners, Richard Hendrix and Carl Lietz, throughout the pendency of the case at length about various strategic issues in this complex and challenging case. In truth, the total is well beyond 100 hours over five years. To be conservative, this chart records 10 hours per year, for a total of 50 hours.

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6/11/25 ²	179, 179-1 through 179-6	Dft's NOI to Serve Subpoenas on O'Brien, Belle, Craft, Weber, and McClelland with 5 Exhibits (review notices; research and analyze production for references to same witnesses; create witness files on Dft's potential witnesses)	0.0		0.0
6/11/25	180	J.G.'s 6th Prod of Docs (376 pages) (review supplemental production prior to production, which included sex offender list at United Inn and consent agreement order relating to county ordinance violations)	0.0		0.0
6/12/25	181	Order re Non-party Northfield Mtn to Intervene (5 pages) (review and analyze order; communicate with co-counsel regarding the same)	0.0		0.0
6/12/25	182	J.G.'s trial subpoenas for Ashar Islam & T. Shareef (prepare and finalize subpoenas; communicate with opposing counsel regarding the same; coordinate service of the same)	0.0		0.0
6/13/25	183	J.G.'s trial subpoenas for Benton, King, and Sabharwal (communicate with Benton and King regarding the same and coordinate service of the same; communicate with opposing counsel regarding	0.0		0.0

² Attorney and paralegal time from 6/11/25 – 7/11/25 is reflected as 0.0 in this part of the chart, because it is recorded in the next section of the chart regarding trial preparation and trial.

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		subpoena of Sabharwal and attempt service multiple times of Sabharwal)			
6/16/25	184	Memo Opinion Denying Northfield's Mtn to Intervene (16 pages) (review and analyze the same)	0.0		0.0
6/19/25		J.G.'s trial subpoenas for N.S. and G.W. (communicate with N.S. and G.W. regarding the same; coordinate service of the same)	0.0		0.0
6/23/25	186	J.G.'s 7th Prod of Docs (229 pages) (review and finalize production)	0.0		0.0
6/23/25	187	Dft's Trial Brief (14 pages) (review and analyze the same; prepare notes on issues to raise in response brief)	0.0		0.0
6/23/25	188	J.G.'s Trial Brief (23 pages) (draft trial brief addressing joint and several liability, punitive damages, deposition designations, and adverse inference; research and analyze caselaw related to the same)	0.0		0.0
6/26/25	194	J.G.'s Mtn to Bring Audio/Visual/Electronic equipment and proposed order	0.0		0.0
6/27/25	196	Proposed Pretrial Order (Draft updated pre-trial order; communicate with opposing counsel regarding the same)	0.0		0.0
6/30/25	198	J.G.'s COS for 8th Prod of Docs (101 pages) (review and finalize production)	0.0		0.0
6/30/25	217	Hearing on Dft's F.R.E. 412 Mtn	0.0		0.0

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		(review and analyze briefing on Rule 412; analyze caselaw on Rule; prepare for and participate in hearing)			
7/1/25	200	J.G.'s 9th Prod of Docs (21 pages) (review and finalize production)	0.0		0.0
7/2/25	201	J.G.'s Resp in Opp to Dft's Trial Brief (10 pages) (review and analyze Dft's trial brief; research caselaw cited therein; draft response)	0.0		0.0
7/2/25	203	Notice of Appeal by Northfield (review notice of appeal)	0.0		0.0
7/2/25	204	Order re J.G.'s and Dft's MILs and Dft's Rule 412 Mtn (49 pages) (review and analyze order; draft notes based on order relating to trial strategy, witness examinations, jury instructions, and opening statement/closing argument)	0.0		0.0
7/2/25	222	Pretrial Conference (prepare for and participate in pretrial conference)	0.0		0.0
7/3/25	223	2nd Pretrial Conf via telephone (prepare for and participate in pretrial conference)	0.0		0.0
7/4/25	208	Consent Mtn to Modify Protective Order through Trial (draft and file consent motion; confer with opposing counsel regarding the same)	0.0		0.0
7/4/25	209	J.G.'s Mtn for Curative Instruction (2 pages) (draft and file motion)	0.0		0.0
7/4/25	210	J.G.'s 10th Prod of Docs (42 pages) (review and finalize production)	0.0		0.0
7/4/25	211	J.G.'s Proposed Voir Dire (8 pages)	0.0		0.0

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		(review and analyze Court's instructions on voir dire; analyze focus group exercise findings; draft proposed voir dire; confer with co-counsel regarding the same)			
7/5/25	212	J.G.'s and Dft's Joint Proposed Jury Instructions and objections (68 pages) (research caselaw relating to proposed jury instructions; review and analyze court's prior orders from MTD, MSJ, and MILs; exchange numerous drafts with opposing counsel of instructions; communicate with co-counsel regarding draft jury instructions)	0.0		0.0
7/6/25	213	J.G.'s First Exhibit List w/ Dft's objections (review and analyze document productions by J.G. and Dft and identify key documents to include on exhibit list; evaluate admissibility; identify relevant witnesses for admission)	0.0		0.0
7/7/25	214	Dft's Exhibit List w/ J.G.'s objections (review Dft's proposed exhibits and prepare objections)	0.0		0.0
7/11/25	219	J.G. Proposed Jury Instructions (Phase 2) (draft proposed jury instructions relating to punitive damages phase; research caselaw relating to the same)	0.0		0.0
TOTAL FOR FILED PLEADINGS, DEPOSITIONS, DISCOVERY REQUESTS, AND DISCOVERY RESPONSES			679.4		17

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<u>FOCUS GROUPS, TRIAL PREPARATION, AND TRIAL</u>					
6/9/25 – 6/27/25		Trial preparation (one partner lawyer averaging 10+ hours per day; one partner lawyer averaging 6+ hours per day; one paralegal averaging 3+ hours per day) ³	288.0		57
6/28/25 – 7/6/25		Trial preparation (two partner lawyers averaging 12+ hours per day; one paralegal averaging 5+ hours per day)	216.0		45
7/7/25 – 7/11/25		Trial (two partner lawyers averaging 16+ hours per day; two paralegals averaging 8+ hours per day)	160.0		80
7/7/25 – 7/11/25		Travel to and from Court for trial (two partner lawyers all days; two paralegals all days; third partner lawyer two days)	15.0		4.0

³ The term “trial preparation” encompasses meeting with Plaintiff; conducting legal research and writing various pre-trial briefs (*e.g.*, motions *in limine* briefing, Rule 412 briefing, trial briefing, and jury charge briefing); meeting with fact witnesses; serving subpoenas; preparing the pretrial order (including the witness list, exhibit list, list of authorities, and more); drafting jury charges; reviewing and re-reviewing document productions to ensure exhibit list is complete because of rule that all exhibits must be listed in pre-trial order; preparing deposition designations and re-reading deposition transcripts to ensure complete designations because of rule that appropriate designations must be disclosed before trial; drafting and preparing witness examination outlines and conferring with co-counsel regarding same; drafting and preparing opening and closing arguments; preparing demonstratives for case presentation; meeting with expert witnesses; conducting focus group exercises to prepare for trial; conferring with colleagues and peers on trial strategy questions; reviewing literature on the same; coordinating various logistics relating to trial. For additional detail on trial preparation tasks, see, for example, the tasks listed from 6/11/25 – 7/6/25 on the preceding pages.

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2/3/25		Focus group on 2/3/25 (6 pm - 10 pm) and prep in advance	6.0		0.0
4/17/25		Focus group on 4/17/25 (6 pm - 9 pm) and prep in advance	5.0		0.0
6/24/25 ⁴		Focus group on 6/24/25 (6pm – 9pm) and prep in advance	0.0		0.0
7/3/25		Focus group on 7/3/25 (9am – 12pm) and prep in advance	0.0		0.0
TOTAL FOR FOCUS GROUPS, TRIAL PREPARATION, AND TRIAL			690		186
<u>EMAIL CORRESPONDENCE</u>					
		David Bouchard emails from 3/20/20 to 8/14/25 (4,759 emails at .1 each)	475.9		
		Oto Ekpo emails from 9/10/24 to 8/14/25 (1,116 emails at .1 each)	111.6		
		Melissa Millen (paralegal) emails from 3/20/20 to 8/14/25 (1,378 emails at .1 each)			137.80
TOTAL FOR EMAIL CORRESPONDENCE			587.5		137.80
<u>SETTLEMENT CORRESPONDENCE</u>					
9/23/22		Plaintiff's unliquidated damages demand under O.C.G.A. § 51-12-14, <i>Southern General v. Holt</i> , 262 Ga. 267, 416 S.E.2d 274 (1992), and <i>Cotton States</i>	2.0		0.5

⁴ Attorney time with focus groups on 6/24/25 – 7/3/25 is reflected as 0.0 because it is recorded in the “trial preparation” description.

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		<i>Mutual Ins. Co. v. Brightman</i> , 276 Ga. 683, 580 S.E.2d 519 (2003)			
10/11/22		Response from Northfield Insurance Company to Plaintiff's 9/23/22 settlement demand	.2		
10/17/22		Plaintiff's response to Northfield Insurance Company's 10/11/22 letter re Plaintiff's settlement demand	.5		
10/20/22		Response from Allianz Insurance Company to Plaintiff's 9/23/22 settlement demand	.2		
5/4/23		Plaintiff's renewed unliquidated damages demand and offer of settlement citing to discovery evidence	2.5		0.1
6/5/23		Response from Northfield Insurance Company to Plaintiff's 5/4/23 settlement demand	.3		
6/26/23		Plaintiff's response to Northfield Insurance Company's 6/5/23 letter re Plaintiff's settlement demand	2.5		
8/7/23		Letter from law firm Freeman Mathis Gary regarding terms of Northfield Insurance policy	.5		
8/23/24		Plaintiff's renewed unliquidated damages demand and offer of settlement	1.0		0.1
8/28/24		Letter from law firm Freeman Mathis Gary regarding Plaintiff's 8/23/24 demand and offer of settlement	.3		
10/9/24		Letter from law firm Freeman Mathis Gary regarding settlement proposal	.4		
10/10/24		Plaintiff's response to 10/9/24 letter from Freeman Mathis Gary regarding settlement proposal	.7		
10/14/24		Letter from law firm Freeman Mathis Gary regarding extended settlement demand	.2		

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5/6/25		Plaintiff's final pre-trial settlement demand and offer of settlement	3.5		0.1
6/5/25		Letter from law firm Freeman Mathis Gary regarding Plaintiff's final pre-trial settlement demand and offer of settlement	.3		
TOTAL FOR SETTLEMENT CORRESPONDENCE			15.1		.8
<u>INVESTIGATIVE WORK AND OPEN RECORDS CORRESPONDENCE</u>					
		Open records letter correspondence with DeKalb County. (4,676 pages of responsive records)	10.0		0.8
		Open records letter correspondence with the City of Decatur.			0.1
		Open records letter correspondence with the City of Tucker.			0.1
		Open records letter correspondence with DeKalb District Attorneys' Office.			0.1
		Open records letter correspondence with DeKalb County Police Department. (11 videos, 3,185 pages of responsive records)	5.0		0.2
		Open records letter correspondence with Rockdale County Sherriff's Office. (4 pages of responsive records)			0.1
		Open records letter correspondence with GBI. (1 page of responsive records)			0.1
		Open records letter correspondence with DeKalb County Tax Commissioner. (2 pages of responsive records)			0.1

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		Open records letter correspondence with Department of Community Supervision.			0.1
		Open records correspondence with Broward County Circuit and County Courts. (37 pages of responsive records)	.3		0.2
TOTAL FOR INVESTIGATIVE WORK AND OPEN RECORDS CORRESPONDENCE			15.3		1.9
<u>DECLARATORY JUDGMENT ACTION IN DISTRICT COURT</u>					
8/14/23	1	Complaint by Northfield Insurance Company (12 pages with 211 pages of exhibits) (review and analyze complaint; communicate with Plaintiff about complaint; confer with co-counsel regarding complaint; confer with insurance coverage counsel regarding complaint; review and analyze subject provisions of insurance policy and analyze complaint in J.G. matter in connection with the same)	2.0		0
9/5/23	5	J.G.'s Acknowledgment of Service	.1		0.1
9/26/23	7	Dft's Motion to Dismiss pages with 2 Exhibits) (review and analyze same; confer with Dft's counsel regarding the same)	1.0		0.0
9/26/23	9	J.G.'s Mtn to Adopt Dft's Northbrook Motion to Dismiss (review and analyze Northfield's complaint; research caselaw relevant to arguments to dismiss the same complaint; confer with insurance coverage counsel	8.5		0.1

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		regarding the same; communicate with United Inn's counsel regarding motion to dismiss)			
9/26/23	10	J.G.'s CIP & Corporate Disclosure Statement	.1		.2
10/5/23	11	Northfield's Consent Mtn for Extension of Deadline to Respond to Dft's MTD with proposed Order (communicate with Northfield's counsel regarding the same)	.1		0
10/20/23	13	Northfield's Response in Opp to Dft's Motion to Dismiss (16 pages) (review and analyze the same; confer with insurance coverage counsel regarding the same)	1.0		0
10/20/23	14	Northfield's Resp to J.G.'s Mtn to Adopt	.1		
10/26/23	15	Joint Preliminary Report & Discovery Plan (participate in meet and confer with Northfield's counsel and United Inn's counsel regarding joint preliminary report and discovery plan; review draft and assist with finalizing)	.6		0
10/30/23	16	Scheduling Order (review and calendar deadlines)	.2		0
11/8/23	18	Initial Disclosures by Northfield (review and analyze)	.5		0
11/9/23	19	Initial Disclosures by Northbrook (review and analyze)	.5		0
11/9/23	20	Initial Disclosures by J.G. (prepare and serve)	1.0		0.1
11/13/23	21	Northbrook's Reply Brief in support of MTD (13 pages)	.7		0

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		(review and analyze same; confer with United Inn's counsel regarding the same)			
11/13/23	22	J.G.'s Mtn to Adopt Northbrook's Reply ISO MTD (review and analyze Northfield's complaint and response brief; research caselaw cited in response brief; confer with insurance coverage counsel regarding the same; communicate with United Inn's counsel regarding reply brief)	2.5		0.1
11/28/23	23	Mtn for Leave to File Sur-Reply Brief in Opp to MTD by Northfield (3 pages with 1 Exhibit) (review and analyze motion for sur-reply brief; confer with United Inn's counsel regarding the same; confer with insurance coverage counsel regarding the same)	.3		0
12/12/23	24	Resp in Opp re Mtn for Leave to File Sur-Reply Brief in Opp to MTD by Northbrook (7 pages) (research and analyze caselaw related to the same; confer with United Inn's counsel regarding same)	1.0		0
12/20/23	25	Reply Brief re Mtn for Leave to File Sur-Reply Brief in Opp to MTD by Northfield (2 pages) (review and analyze)	.1		0
9/16/24	28	Order Granting in part MTD (33 pages) (review and analyze order; confer with insurance coverage counsel regarding the same)	1.0		0
10/15/24	29	Northfield's Notice of Appeal re Order on MTD (confer with insurance coverage counsel regarding the same; communicate with Plaintiff about the same)	.6		0

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TOTAL FOR DECLARATORY JUDGMENT ACTION IN DISTRICT COURT			21.9		.6
<u>DECLARATORY JUDGMENT APPEAL</u>					
10/29/24	5	Northfield's Civil Appeal Statement (review and analyze civil appeal statement)	.2		0
10/29/24	7	Briefing Notice issued (review briefing notice and calendar deadlines)	.2		0.1
10/31/24	8	Appearance of Counsel by J.G. (prepare and file)	.2		0.1
11/8/24	10	Notice to Counsel re Mediation (review notice regarding mediation)	.2		0.1
11/14/24	11	J.G.'s CIP and Corporate Disclosure Statement (prepare and file)	.3		0.1
1/9/25	15	Appellant's Brief by Northfield (21 pages) (review and analyze appellant's brief; confer with United Inn's counsel regarding the same; confer with insurance coverage counsel regarding the same; research and analyze caselaw cited therein)	2.0		0
3/12/25	24	Joint Appellees Brief by Northbrook and J.G. (47 pages) (draft portion of joint appellees brief; confer with United Inn's counsel regarding the same; confer with insurance coverage counsel regarding the same; research and analyze caselaw related to the same sections)	30		0.5

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5/2/25	28	Reply Brief by Appellant Northfield (17 pages with 1 exhibit) (review and analyze reply brief; research caselaw cited therein and evaluate whether to file sur-reply brief)	2.5		0
TOTAL FOR DECLARATORY JUDGMENT APPEAL			35.6		0.9

<u>TOTAL FINCH MCCRANIE HOURS</u>					
		Total Hours	2,044.8		345

To be conservative in the fees chart:

- We are not including time for any lawyers other than David Bouchard from pre-suit investigation in 2020 through September 10, 2024 (when Oto Ekpo filed a notice of appearance).
- We are not including the time other Firm partners spent in conversations relating to discovery strategy, settlement strategy, and trial strategy over the course of the five-year litigation (100+ hours). The only time recorded in the chart is for Firm partners who appeared as trial counsel, David Bouchard and Oto Ekpo.
- We are not including time spent by a former Finch McCranie associate (former federal law clerk), because that associate is now employed by a new firm and did not record his time before departing (100+ hours).
- We are not including time researching and drafting Plaintiff's motion for attorneys' fees, preparing this fee exhibit, coordinating with co-counsel on their fee exhibit, preparing affidavits, coordinating with co-counsel on preparation of their affidavits, and engaging expert T. Mykkeltvedt (40+ hours).

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- We are only using .1 for emails, even though there is extensive email correspondence in the case for which .1 is dramatically underinclusive.
- We are not including trial-prep work that was duplicated following the re-scheduling of the trial from April 2025 to July 2025.
- We are not including telephone conferences with opposing counsel relating to the case (20+ hours).
- We are not including time spent by summer law clerks over multiple summers with the case pending for five years (100+ hours).